

Comments
“DOT Chart 13”

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Comments:

Good Afternoon,

We have recently distributed the DOT Chart 13 to our Regulatory Affairs Committee for review, and they have come back with the following comments (please note comments by different individuals are separated):

Chart 13 Remarks (March 2009):

There is a notation on the back of DOT Chart 13 on top of Placarding Table #2 which states:

(Placard 1,001 lbs or more)

I think that the form need to specify that this is a placarding exception for truck and rail only and does not apply to water shipments. This is often confusing to domestic water container shippers due to the way the note is listed.

Note the regulatory reference from 49CFR172.504(c):

"(c) Exception for less than 454 kg (1,001 pounds). Except for bulk packagings and hazardous materials subject to § 172.505, when hazardous materials covered by Table 2 of this section are transported by **highway or rail, placards are not required** on—

172.504(c)(1)

(1) A transport vehicle or freight container which contains less than 454 kg (1001 pounds) aggregate gross weight of hazardous materials covered by Table 2 of paragraph (e) of this section; or

172.504(c)(2)

(2) A rail car loaded with transport vehicles or freight containers, none of which is required to be placarded.

The exceptions provided in paragraph (c) of this section do not prohibit the display of placards in the manner prescribed in this subpart, if not otherwise prohibited (see § 172.502), on transport vehicles or freight containers which are not required to be placarded."

The new organic peroxide label looks funny because they allow the flame to white but not the other text or information—it makes it look like a four color label, it is bad enough at three. They should put text near divisions 2.1, 2.2, 4.3 and 5.2 and Class 3 indicating that all text and symbols may also be black, or better yet, give the examples of the black print—they have the room.

I would like to suggest that the new marine marking and new cargo aircraft label be incorporated into the revised Chart 13.

HM-215J (14Jan09) updated the Marine Pollutant Mark with the international mark (dead fish and tree). This chart still has the old mark.

HM-215J also authorizes the new Cargo Aircraft Only Label although the one shown may be used until 2013.

Please contact our office at 703/451-4031 or mail@costha.com if you have any questions.

Best Regards,

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